

**REMARKS**

The examiner's action dated February 5, 2008, has been received and its contents carefully noted.

The formal objections to Claims 7, 8, 9, 10 have been overcome by appropriate claim amendments. However, it is noted that MPEP 2110.4 indicates that whether "adapted to" is a limitation depends on the facts of each case and that no specific reason has been given as to why this phrase should not be considered a limitation in the present case.

The rejection of claims 1-10 under 35 USC 103, as obvious over Manganini (US 2003/0026203) in view of Taniguchi (US 6,122,250) is respectfully traversed for reasons to be presented below.

Claim 1 has been amended only informal respects.

It is correct that Manganini describes a specific mechanism of utilizing the known MS-SPRING/BLSR protection in ring topology networks and mentions SONET/SDH traffic as the traffic typical for ring networks.

It is also correct that in paragraph [0011] Manganini refers to the fact that management of protection for rings networks is standardized by the Recommendation ITU-T G.841, Annex A, by utilizing bytes K1, K2 and MSOH section of a SONET/SDH frame.

However, neither the Manganini reference, nor the Recommendation ITU-T G.841, Annex A, discusses or mentions a problem of protecting the completeness of Ethernet traffic (in case Ethernet packets are enveloped within the SONET/SDH frames) and in case a fault in the ring network results in a so-called "isolated node". Neither the

Manganini reference, nor the ITU-T reference (Annex A or other part) recognizes that problem.

Neither the Manganini reference, nor the ITU-T reference recommends preventing the squelching mechanism or preventing the standardized use of byte J1 for SDH/SONET containers carrying Ethernet traffic. (The J1 byte performs a standard mechanism of trail control which would have the same effect as the squelching has - see page 7, lines 19-28 of the present specification.)

The Examiner further considers that while Manganini does not teach the method comprising prevention of initiation of squelching algorithm of the MS-SPRING/BLSR system with respect to the SDH/SONET virtual containers carrying Ethernet packets, the Taniguchi reference does teach that limitation.

The Applicant strongly disagrees.

Taniguchi describes a solution that generally belongs to the field of the invention (i.e., mechanisms for protection in case of faults in ring-type bidirectional telecommunication networks, utilizing a squelch method). However, the cited solution has nothing in common with the present invention, and nothing in common with the limitation cited by the Examiner.

Taniguchi discloses a technology for increasing the speed of the squelch processing without increasing the size of the circuit (see the first paragraph of Taniguchi's Summary). For increasing the speed of squelching in case of fault(s) in a network, Taniguchi provides nodes (A to F) having modified squelch tables and squelch decision units. Each of the nodes, based on topographic and fault

information, makes its local decision about performing or not performing a squelch operation (see abstract; paragraph 2 of the summary), thus accelerating the squelch processing. Nothing is mentioned by Taniguchi about any relation or connection of the squelch decisions with any type of traffic in the network.

In contrast to that, the present invention, as defined in Claim 1 provides a method to completely disable the squelching process in respect of the SDH/SONET virtual containers carrying Ethernet packets, for ensuring protection of the Ethernet traffic in a ring network if a so-called "isolated node" is detected. In addition, the present invention, as defined in Claim 1 prevents the standardized use of byte J1 in the SDH/SONET frames carrying the Ethernet traffic.

Taniguchi neither discusses protecting Ethernet traffic, nor describes shutting down the squelching operation with respect to any specific traffic packets. Ethernet is definitely not mentioned. Taniguchi does not mention preventing the standard function of byte J1 either.

Therefore, it should be emphasized that:

1. Taniguchi (as well as Manganini) does not recognize the problem of losing Ethernet traffic when an isolated node appears in a ring network, and therefore does not try solving it.

2. Taniguchi teaches away from the present invention, since he is interested in acceleration of the squelching operation (and not in total suppression of the squelching for a specific type of traffic to protect that traffic).

The Examiner considers that the combination of the squelch decision of Taniguchi with MS-SPRING/BLSR protection of Manganini allows a skilled person to decide which kind of traffic is to be protected and which is to be squelched. It is incorrect. Nothing in the above virtual combination of Manganini and Taniguchi seems to mention or discuss any problem for any specific type of traffic when the MS-SPRING/BLSR protection is utilized in a ring network.

Recognition of the problem is one "missing link" in the logical chain built by the Examiner. Without this missing link, the theoretical combination of Manganini and Taniguchi, imagined by the Examiner, cannot motivate a skilled person to arrive to the present invention.

Indeed, a person skilled in the art, when combining the Manganini and Taniguchi references, could not arrive to the proposed solution at the time of the invention, since that person at that time did not recognize the specific problem, namely: that appearance of an "isolated node" triggers a conventional squelching algorithm eliminating traffic that originates or terminates at the isolated node; the squelching causes loss of all Ethernet traffic enveloped by SDH/SONET containers, since the Ethernet traffic must perform termination/generation operations at every node of a ring network (see page 5, line 10 to page 6, line 10 of the present specification).

Another "missing link" in the above-mentioned logical chain is set-up of a task. The inventors have set up (and have solved) the task to overcome the described problem at

the SDH/SONET level, without utilizing additional, complex, heavy and expensive means on a higher level, such as the STP protocol.

Without recognizing the problem and setting up the task, a skilled person could not propose a) the very idea of protecting Ethernet traffic from elimination at the very SDH/SONET level in a ring network, and b) the solution to initiate suppression of the conventional squelching mechanism at least with respect to SDH/SONET containers carrying Ethernet traffic, and at least upon detecting appearance of the "isolated node" in the ring network.

The applicants would like to emphasize that they are the first to propose a solution of the above-described problem at the 1<sup>st</sup>, SDH/SONET, level (and not at a 2<sup>nd</sup> level Ethernet, requiring more complex and expensive tools).

Thus, claim 1 distinguishes over the prior art at least by the following recitations:

Said method...includes utilizing MS-SPRING/BLSR system for SDH/SONET traffic protection and, in case of detecting at least one isolated node in the network,  
said method comprising preventing initiation of a squelching algorithm of the MS-SPRING/BLSR system with respect to the SDH/SONET virtual containers carrying the data Ethernet packets,  
while ensuring that there is no standardized use of byte J1 in the network, with respect to the SDH/SONET virtual containers carrying the Ethernet packets.

Applicants therefore request that, in view of the presented comments and the amendments to Claim 1, which emphasizes the fact of performing the Ethernet traffic protection at the SONET/SDH level, the Examiner reconsider his opinion and agree that the invention claimed in the amended Claim 1 satisfies the criterion of non-obviousness. Support for the amendments of Claim 1 can be found in the specification, for example at page 8 lines 4-6 and page 7, lines 8-11.

The dependent claims should be considered inventive at least due to being dependent from the inventive main claim.

In response to the rejection of claims 8-10 under 35USC101, claim 8 has been amended to specify that the software product is stored on a computer readable medium, which thereby causes claims 8-10 to define a product, and thus statutory subject matter.

In view of the foregoing, it is requested that the objections and rejections of record be reconsidered and withdrawn and that claims 1-10 be allowed.

Respectfully submitted,

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